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# Exhibit Q

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# Exhibit R

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## Paradigm Shift: From Strategical to Tactical

### **Overview**

The Voice Process Team has historically been a strategically focused entity, typically expending its energy on improving processes strategically. In this role, the team has sought to design and implement durable solutions that support the company's long-term vision of its position in the marketplace. While the team has certainly "fire-fought" on occasion, ultimately the team was always looking to developing better fire prevention methods, not better fire fighting techniques.

### **What's Changing?**

With the announcement of the MCI/Worldcom merger, and the pending subsequent sale of the Intermedia lines of business to another organization, the need of the company for a long-term focused process team has been greatly diminished. As follows logically, the need for a short-term focused process team has arisen. This team must spotlight quick response time in defining a solution for the problem they are asked to tackle. Re-directing the VPT to fill this need is the best way to satisfy this need.

### **Activity Direction**

The Marketing-lead, product leadership teams have been made accountable by Senior Management for the profitability of the product lines they manage. With this charter these teams will identify and prioritize the issues that require resolution, and will then delegate the work to design and implement a resolution to various standing, and when appropriate ad hoc, teams. The Lifecycle teams are the primary groups responsible for this design and implementation work.

### **Proposal**

To set a proper tone for the VPT in its new approach to improving the business, the following operational changes are proposed:

1. *Adopt a project-based format* – Rather than continuing with the "initiative" format the team has used during the prior six months, a more project-based format will serve the team better.
2. *Conduct more frequent, less lengthy meetings* – In order to respond more quickly to issues brought forth for resolution, the team must meet more frequently. Weekly for two hours is a much more appropriate schedule than bi-weekly for four hours given this "brave, new world."

### **What Isn't Changing**

Although this is a fundamental change in how the team operates, some things are not changing:

1. *Team members should still bring their issues to the team* – Although the product leadership teams will be directing the issues the VPT tackles, each person should still bring their issues to the team. The team leader, who sits on the applicable product leadership team, can (and will) take these issues to that team for discussion and prioritization.
2. *The VPT is still a forum for general coordination* – it is absolutely imperative the team continue to serve as a central place where information can be shared on other activities taking place in the company. This includes both other teams (such as SOES) and changes taking place internally to departments that are of importance to others (such as the Busy/Bad CFA process.)
3. *The importance of your dedication* – now more than ever the VPT needs dedicated, solution oriented, big picture-focused individuals to design and implement fixes.

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JCI CDS

WWDZ

You are those people! Your applied expertise is the only way the company will be successful through the next six to twelve months.

**The Mission List**

Since we seem to be engaged in pseudo-military jargon lately, I felt it appropriate to refer to our projects as "sorties."<sup>1</sup> Here are the existing sorties the VPT is focused on:

Sortie	Status	Priority
CHIPS	Design work complete; pending implementation	1
IntermediaOne	Process design work underway	1
Disconnect Process	Front end re-design underway	2
MAC Process	Quick hit opportunities identified; executing where appropriate	3

<sup>1</sup> Sortie- 1) a sudden issuing of troops from a defensive position against the enemy;  
2) one mission or attack by a single plane

# Exhibit S

**Kloepfel, Michele**

---

**From:** Bernard J. Ebbers [no\_replies\_please@wcom.com]  
**Sent:** Tuesday, September 05, 2000 9:15 AM  
**Subject:** Intermedia merger

To All Employees:

Today we announced an exciting merger that promises to catapult our generation d initiative to new heights. We have agreed to acquire Intermedia, a U.S.-based competitive local exchange carrier, which also gives us control of Digex, one of the industry's leading Web and application hosting services companies.

WorldCom, through the top talent of our UUNET division, is already an established leader in the hosting market. By gaining control of Digex, we will accelerate by 12 to 18 months our plans in the high-growth corporate and enterprise hosting marketplace.

Gaining control of Digex will create an incredible combination. Digex' strengths combined with our enterprise customer base, global IP network and expansive data center footprint, gives WorldCom employees an amazing opportunity. Together, we will seize the marketplace by creating an effective and innovative competitor that generates high-growth returns for our shareholders, value for our customers and endless opportunities for our employees.

We expect to close the merger early next year, after gaining federal and state regulatory approvals. Over the coming days, your management team will be able to provide you additional details about how Digex and Intermedia will factor into our plans moving forward.

Thanks for your continued hard work. And join me as we continue to advance our future through generation d.

Bernie

-----  
WorldCom, Inc. Corporate Employee Communications

**KloeppeL, Michele**

---

**From:** Hovanky, Eric T.  
**Sent:** Monday, September 11, 2000 8:29 AM  
**To:** Sullivan, Scott; Borghardt, Bruce  
**Cc:** Myers, David; KloeppeL, Michele  
**Subject:** RE: Intermedia/Digex - Risk Management/Insurance Due Diligence?

Scott,

Will do. Just wanted to cover our bases.

*done*

Eric

-----Original Message-----

**From:** Sullivan, Scott [mailto:[Scott.Sullivan@wcom.com](mailto:Scott.Sullivan@wcom.com)]  
**Sent:** Friday, September 08, 2000 6:29 PM  
**To:** Hovanky, Eric T.; Borghardt, Bruce  
**Cc:** Myers, David; KloeppeL, Michele  
**Subject:** RE: Intermedia/Digex - Risk Management/Insurance Due Diligence?

Eric,

I would hold off for right now. The bulk of Intermedia will be sold off.  
You should contact Jim Renna in a few weeks.

Thanks,

Scott

-----Original Message-----

**From:** Hovanky, Eric T.  
**Sent:** Friday, September 08, 2000 2:27 PM  
**To:** Sullivan, Scott; Borghardt, Bruce  
**Cc:** Myers, David; KloeppeL, Michele  
**Subject:** Intermedia/Digex - Risk Management/Insurance Due Diligence?

Scott,

Is it time for me to start looking into these entities'  
insurance-related programs and data? We're ready to do it.

Bruce,

Could I get a copy of the Merger Agreement(s) and  
pertinent attachments? Thanks.

Eric

# Exhibit T

## KELLEY DRYE &amp; WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

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EMAIL: [ksmith@kelleymdrye.com](mailto:ksmith@kelleymdrye.com)

October 24, 2005

**VIA FACSIMILE ((816) 691-3495)**

Robert L. Driscoll, Esq.

Stinson Morrison Hecker LLP  
1201 Walnut Street, Suite 2800  
Kansas City, Missouri 64106Re: In re WorldCom, Inc., Chapter 11 Case No. 02-13533  
Parus Holdings' Claims; Discovery Issues

Dear Mr. Driscoll:

As discussed on Friday, October 21, 2005, at the settlement conference, and in a further attempt to resolve our outstanding discovery issues, we write to provide you with specific categories of documents previously requested, but not yet produced in this litigation. In addition, we provide you with names of individuals whose electronic databases and e-mail boxes should be searched as well as search terms for searches in Debtors' electronic databases and e-mail boxes. The items identified below are an attempt to narrow certain categories of documents pursuant to your request. We reserve all rights with respect to Parus Holdings' document requests.

First, please refer to our October 11, 2005 letter to Judge Gonzalez and copied to you. In addition, the following highlight certain outstanding production categories for electronic and hard-copy documents, which should be produced:

- Documents concerning the Unified Communications Services General Agreement ("General Agreement") itself, including the pricing of services, negotiation, drafting or communications among Intermedia employees and/or between Intermedia and WorldCom/MCI, regarding the General Agreement. (Document Request No. 11.)
- Documents reflecting Intermedia's payments to Claimant for any services provided by Claimant under the General Agreement or any documents concerning communications regarding payments to Claimant. (Document Request No. 17.)